

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Use of Spectrum Bands Above 24 GHz For)	GN Docket No. 14-177
Mobile Radio Services)	
)	
Establishing a More Flexible Framework to)	IB Docket No. 15-256
Facilitate Satellite Operations in the 27.5-28.35)	
GHz and 37.5-40 GHz Bands)	
)	
Petition for Rulemaking of the Fixed Wireless)	RM-11664
Communications Coalition to Create Service)	
Rules for the 42-43.5 GHz Band)	
)	
Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95,)	RM-10-112
and 101 To Establish Uniform License Renewal,)	
Discontinuance of Operation, and Geographic)	
Partitioning and Spectrum Disaggregation Rules)	
And Policies for Certain Wireless Radio Services)	
)	
Allocation and Designation of Spectrum for)	IB Docket No. 97-95
Fixed-Satellite Services in the 37.5-38.5 GHz,)	
40.5-41.5 GHz and 48.2-50.2 GHz Frequency)	
Bands; Allocation of Spectrum to Upgrade Fixed)	
and Mobile Allocations in the 40.5-42.5 GHz)	
Frequency Band; Allocation of Spectrum in the)	
46.9-47.0 GHz Frequency Band for Wireless)	
Services; and Allocation of Spectrum in the 37.0-)	
38.0 GHz and 40.0-40.5 GHz for Government)	
Operations)	

**VERIZON'S REPLY IN SUPPORT OF NEXTLINK'S PETITION FOR
RECONSIDERATION**

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The Commission should grant Nextlink’s unopposed request to reconsider making only one sub-block (A1) of the “LMDS” band available for the flexible use that will pave the way for 5G deployment.¹ Applying the new flexible-use rules to the A2, A3, and B portions of the LMDS band as well would promote investment and innovation in 5G technologies and avoid unnecessary inefficiencies.

Many parties supported repurposing the entire LMDS band in comments on the initial rulemaking.² Doing so would create operational efficiencies and device economies of scale, which would promote 5G deployment. Equipment manufacturers could more readily develop and design devices for 5G use in the A1 frequencies that also take advantage of the additional capacity available for A2, A3, and B—but only if all of the spectrum is subject to the same service rules. And for operators needing substantial blocks of contiguous spectrum for 5G deployments, repurposing A3 and B is the only way to unlock the 300 MHz of continuous spectrum (from 31.00 to 31.30 GHz) that those blocks collectively constitute. But we cannot achieve those benefits if portions of the LMDS spectrum remain relegated to the service rules and limited (non-mobile) use under the Part 101 rules.

Without reconsideration, A block licensees could not use their A2 and A3 spectrum for mobile 5G applications. And they would be required to bifurcate their operations in the A block,

¹ Petition for Reconsideration or, in the Alternative, Clarification of Nextlink Wireless LLC, GN Docket No. 14-177 *et al.*, at Section III (filed Dec. 14, 2016).

² See, e.g., Comments of the National Cable & Telecommunications Association, GN Docket No. 14-177, *et al.*, at 18-20 (filed Jan. 28, 2016); Comments of T-Mobile USA, Inc., GN Docket No. 14-177, *et al.*, at 7-8 (filed Jan. 27, 2016); Comments of XO Communications, LLC, GN Docket No. 14-177, *et al.*, at 3, 7, 11-18 (filed Jan. 28, 2016); Comments of Verizon, GN Docket No. 14-177, *et al.*, at 6 n.4 (filed Jan. 28, 2016); Comments of Mobile Future, GN Docket No. 14-177, *et al.*, at 9-10 (filed Jan. 27, 2016); Comments of Nokia, GN Docket No. 14-177, *et al.*, at 3, 12-13 (filed Jan. 27, 2016); Reply Comments of Samsung Electronics America, Inc. and Samsung Research America, GN Docket No. 14-177, *et al.*, at 14-15 (filed Feb. 26, 2016).

creating uncertainty about how to comply with different operating rules and performance requirements that apply to different portions of the same licenses.

If necessary, the Commission could establish a coexistence framework to govern a repurposed A2 sub-block, which currently a single satellite operator uses for feeder links.³ The Commission also should promptly move to ensure that operations in the other repurposed LMDS frequencies can coexist with operations in adjacent 31.3-31.8 GHz band.⁴ Addressing those minor issues will unleash more LMDS spectrum for 5G use, building on the Commission's work to make the United States a global leader in 5G.

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³ Iridium stated in its Further Notice reply comments that it operates satellite feeder links in the A2 block (29.1-29.25) on a co-primary basis with LMDS operations. Reply Comments of Iridium Communications, Inc., GN Docket No. 14-177 *et al.* at 3 (filed Oct. 31, 2016).

⁴ See Comments of Nextlink Wireless, LLC, GN Docket No. 14-177 *et al.*, at 12-13 (filed Sept. 30, 2016).